

EXHIBIT D

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: NATIONAL COLLEGIATE
ATHLETIC ASSOCIATION STUDENT-
ATHLETE CONCUSSION LITIGATION**

MDL NO. 2492

Master Docket No. 13-cv-09116

Judge John Z. Lee

Magistrate Judge Geraldine Soat
Brown

DECLARATION OF SHELBY WILLIAMS

I, Shelby Williams, under oath, declare as follows:

1. I am a current student-athlete at Northwest Missouri State University in Maryville, Missouri. I permanently reside in Adair, Iowa. I am a sophomore and a member of the women's golf team. I am not related to any of the lawyers currently representing the parties in this matter. I have not been promised any compensation for my participation in this matter. I have full knowledge of the matters stated herein and could and would testify hereto if necessary.
2. I received and reviewed the Amended Settlement Agreement in this matter. I was asked to review the Settlement Agreement on behalf of current and former NCAA student-athletes who have played non-contact sports.
3. I reviewed it with the threshold question in mind of whether it was appropriate for current and former student-athletes who played non-contact sports to participate in the Settlement. I also reviewed it with the question in mind of whether the receipt of the benefits under the Settlement was fair to non-contact sports student-athletes in exchange for the release of the claims outlined in the Settlement.

4. I also took the opportunity of to talk to my friends who currently play NCAA sports to get their views.

5. I think the concussion issues raised in this litigation are very important to NCAA student-athletes. Many NCAA student-athletes are impacted on a daily basis by concussion management practices within the NCAA. While non-contact sport athletes are not affected on a daily basis, concussions can and do still occur.

6. For those student athletes who suffer effects from concussions, I believe that all current or former student-athletes should have access to the Medical Monitoring Program – regardless of the sport they played. Each of us has dedicated time to the NCAA to play our sport, and should have access to the diagnostic program provided under the Settlement.

7. During my review of the Settlement, I realized that it provided for trained personnel to be present at contact sports events but not at non-contact sports events. I do not believe that this difference means that the Settlement is unfair to non-contact sports athletes due to the rarity of concussions at non-contact sports events. However, in the event that a concussion occurs at a non-contact sports event, we will now have a baseline test against which to test our recovery from the injury as well as a rule that prevents us from being returned to play too early. These are important benefits that will protect all student-athletes, regardless of sport, in the future.

8. I also support the settlement because I have friends that have suffered concussions. I believe it is important for me to step forward and ensure that all student-athletes in all sports are protected in the future. I also believe it is important for me to ensure that non-contact sports athletes receive the medical benefits provided under the Settlement.

9. I am willing to be a class representative in this litigation if the Court decides my participation is needed, and I will stay abreast of developments in the litigation.

Date: November 1, 2014

Shelby Williams

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